

# **EXHIBIT “A”**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

N RE: AIR CARGO SHIPPING SERVICES :  
ANTITRUST LITIGATION : MDL No. 1775

THIS DOCUMENT RELATES TO: : Master File 06-MD-1775 (JG)(VVP)  
ALL ACTIONS

~~PROPOSED~~ FIFTH STIPULATED REVISED DISCOVERY  
AND CLASS CERTIFICATION BRIEFING SCHEDULE

October 8, 2012	Fact depositions resume. No party may rely upon or cite any of the testimony in connection with the motion for class certification or any further papers with respect thereto.
October 16, 2012	First date by which Plaintiffs make their class certification reply experts available for deposition – deposition dates to be agreed upon by the parties.
November 15, 2012 or sooner	Parties meet and confer regarding the total number of additional fact depositions to be taken, with any disagreement to be presented to the Court in December 2012.
December 21, 2012	Deadline for any deposition of Professor Mehra.
March 22, 2013	Deadline for any depositions of Drs. Tollison and McClave, and Eric Wittgen, limited to the subject of their reply declarations, including how those declarations relate to any earlier declarations and class certification. No further expert depositions will be permitted.
April 22, 2013	Parties file Daubert motions, if any, together with any supporting expert declarations. Defendants may also file a single sur-reply brief of not more than 25 pages, as well as further expert reports responding to Plaintiffs' reply briefs and expert declarations in support thereof. Other than with respect to the Daubert motions (if filed), no further briefing on class certification will be permitted.

IF NO DAUBERT MOTIONS  
ARE FILED

May 20, 2013 or later: The Court shall hold an evidentiary hearing (2 days) with respect to Plaintiffs' motion for class certification. Witnesses shall be limited to experts who have submitted declarations.

IF DAUBERT MOTIONS ARE FILED

July 22, 2013: Parties file any opposition to Daubert motions, together with any supporting expert declarations.

September 11, 2013: Parties may file replies in support of Daubert motions, together with any supporting expert declarations. No further briefing on Daubert motions will be permitted.

October 7, 2013 or later: The Court shall hold an evidentiary hearing (2 days) with respect to Plaintiffs' motion for class certification and any Daubert motions. Witnesses shall be limited to experts who have submitted declarations.

December 31, 2013:

End of fact discovery.

Dated: March 1, 2013

Respectfully submitted,

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*So Ordered*

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*Viktor V. Pohorelsky*

*United States Magistrate Judge*

Dated:

*March 6, 2013*